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PETITION RULE PRM 26-2
(64FR67202)

Ms. Annette L. Viette-Cook
Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Attention: Rulemakings and Adjudications Staff

Gary J. Taylor
Vice President
Nuclear Operations

Dear Ms. Viette-Cook:

Subject: VIRGIL C. SUMMER NUCLEAR STATION
DOCKET NO. 50/395
OPERATING LICENSE NO. NPF-12
COMMENTS ON PETITION FOR
RULEMAKING DATED SEPTEMBER 28, 1999
FILED BY MR. BARRY QUIGLEY,
(64FR 67202, December 1, 1999)

South Carolina Electric & Gas Co
Virgil C. Summer Nuclear Station
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South Carolina Electric & Gas Company (SCE&G) has reviewed the proposed notice of rulemaking and hereby requests that the Nuclear Regulatory Commission deny the request for proposed rulemaking as unnecessary for the continued safe operation of nuclear power plants. SCE&G endorses comments provided by the Nuclear Energy Institute relative to this matter.

Additionally, SCE&G submits the following comments:

It is the best interest of the company to ensure the continued safe and efficient operation of the company's asset in maintaining a nuclear power plant that is competitive through reliable operations. To that end, great effort is taken to maintain a favorable working environment for company employees. Working hours must remain flexible to allow station management various options to control operations and maintenance cost, as well as, fulfill the needs and desires of professional employees.

The suggested requirement to provide initial and continuing fatigue mitigation training for all personnel performing safety related work, their supervisors, and managers is excessive and represents a significant new regulatory burden for a competitive industry to endure. Fatigue related issues have not proven to be a concern at the Virgil C. Summer Nuclear Station.

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The new administrative obligation to track hours worked performing safety related work, as opposed to work that is not safety related, for all employees represents an unjustified and unnecessary regulatory burden.

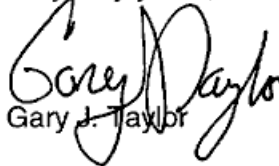
Refuel outage durations have dropped significantly over the last few years. The industry has seen a resultant decrease in the number of highly skilled and trained contractors who are willing to relocate to the station for short duration outages. The lure for some of this highly skilled labor force is the promise of overtime work hours and the associated overtime pay that comes with working seven day work weeks. The proposal suggests outage work hour limits that will remove an incentive which attracts certain skilled outage laborers. There is a potential impact on the continued ability to meet outage schedules. Extending outage durations could prove to increase risks with regards to shutdown safety.

It is our experience that employees who work night shift rarely take full advantage a day off to rest and relax. Many choose to swap to dayshift hours on a day off to enjoy time with their family. The subsequent move back to nightshift causes increased strain as their bodies adjust to the rapid changes in schedule. This may impact their ability to think clearly and work safely. Permanent plant personnel would generally only be asked to work increased overtime to support outages once (in most cases for about 30 days) in an 18-month cycle.

It is SCE&G's contention that, existing regulations and guidance which are a part of the station's license as Technical Specification 6.2.2.e, are sufficient to limit the working hours of unit staff who perform safety related functions.

If you have any questions please call at your convenience.

Very truly yours,


Gary J. Taylor

RAM/GJT/dr

c: J. L. Skolds
J. J. Galan
R. J. White
K. R. Cotton
NRC Resident Inspector

J. B. Knotts, Jr.
NSRC
RTS (O-L-99-0414-1)
File (811.02, 26.004)
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